

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SANELA KOLENOVIC,

Plaintiff,

Civil Action No. 08 CV 0067 (WHP)

-against-

**ABM INDUSTRIES, INC., ABM ENGINEERING
SERVICES COMPANY, ABM JANITORIAL
NORTHEAST, INC. and FRANCIS NAGROWSKI,**

**JOINT REPORT ON WRITTEN
DISCOVERY PLAN**

Defendants.

Pursuant to Fed. R. Civ. P. 26(f), the parties have conferred and jointly propose the following discovery plan:

- A. [W]hat changes should be made in the timing, form, or requirement for disclosures under Rule 26(a), including a statement of when initial disclosures were made or will be made;**

Plaintiff served her initial disclosures under Fed. R. Civ. P. 26(A) on March 5, 2008.

Defendants will serve their initial disclosures under Fed. R. Civ. P. 26(A) on or before March 31, 2008. No changes should be made to the form or requirement for these disclosures.

- B. [T]he subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused on particular issues;**

Discovery is needed on all of Plaintiff's claims raised in her Complaint, her mitigation efforts and Defendants' defenses to Plaintiff's claims, as well as any issues that arise during the course of this litigation. Discovery should be completed by October 17, 2008. Discovery should not be conducted in phases or be limited to or focused on particular issues.

- C. [A]ny issues about disclosure or discovery of electronically stored information, including the form or forms in which it should be produced;**

The parties do not anticipate a need for special deadlines, procedures or orders of the court dealing with electronic discovery. The parties do not anticipate an extensive exchange of electronic information. Any electronic discovery shall be produced in hard copy.

- D. [A]ny issues about claims of privilege or of protection as trial-preparation materials, including—if the parties agree on a procedure to assert these claims after production—whether to ask the court to include their agreement in an order;**

The parties agree to discuss an appropriate procedure to assert claims of privilege or protection as trial-preparation material if and when this becomes an issue.

- E. [W]hat changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed; and**

None at this time.

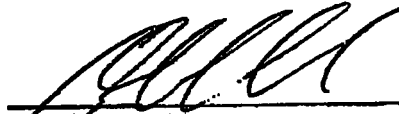
- F. [A]ny other orders that the court should issue under Rule 26(c) or under Rule 16(b) and (c).**

The Court has already issued a Confidentiality Stipulation governing the exchange of confidential information among the parties under Fed. R. Civ. P. 26(c). The parties also request that the Court enter a Scheduling Order under Fed. R. Civ. P. 16(b). The parties propose the following deadlines for the Court's consideration:

1. Date for completion of automatic disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure: **March 31, 2008.**
2. Time for amendment of pleadings: **May 16, 2008.**
3. Date for completion of factual discovery: **October 17, 2008.**
4. Date for Plaintiff's expert witness disclosure under Fed. R. Civ. P. 26(a)(2): **Within 45 days after close of factual discovery.**
5. Date for Defendants' expert witness disclosure under Fed. R. Civ. P. 26(a)(2): **Within 30 days after Plaintiff's expert witness disclosure.**
6. Date for completion of expert witness discovery: **Within 60 days after Defendant's expert witness disclosure.**

7. Date for filing dispositive motions: Within 60 days after close of factual discovery.

Dated: March 26, 2008
New York, New York



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Dated: March 28, 2008
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